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# EXHIBIT C



Paula K. Colbath

Partner

345 Park Avenue New York, NY 10154 
 Direct
 212.407.4905

 Main
 212.407.4000

 Fax
 212.407.4990

 pcolbath@loeb.com

Via email (<a href="mailto:pmurphy@wpdn.net">pmurphy@wpdn.net</a>) and First Class Mail

August 26, 2024

Patrick Murphy, Esq. Williams, Porter, Day and Neville, P.C. 159 N Wolcott St., Suite 400 Casper, WY 82601

Re: BCB v MineOne Wyoming Data Center LLC et al. – August 22, 2024 Order

Dear Patrick:

As you know, we, along with our co-counsel Hathaway & Kunz, LLP, represent Defendants MineOne Wyoming Data Center, LLC ("MineOne"), MineOne Partners, LLC, and Terra Crypto Inc. (collectively, the "MineOne Defendants").

We write pursuant to the Court's August 22, 2024 Order (ECF No. 322) to provide the following information regarding Chong "Lucas" Wang and Huali "Wiley" Zhang:

#### Chong "Lucas" Wang

As we have advised you for months, Mr. Wang is not an officer, member, employee and/or director of any of the MineOne Defendants. Mr. Wang does not own individually any interest in a MineOne Defendant, nor does he have any decision making authority over any of the MineOne Defendants. According to public filings filed with Defendant Bit Origin Ltd. with the Securities Exchange Commission, Mr. Wang was previously the Chief Executive Officer of Defendant Bit Origin Ltd., which we understand to be a public company which trades on NASDAQ under the ticker symbol BTOG. Our clients have confirmed to us that Mr. Wang never visited the digital currency mining facilities that are the subject of this action.

Mr. Wang's last known address (from Bit Origin Ltd.'s public filings) is:

Room 1802, Building 1, Renheng Tang Yue Wan, Binhe Road, High-Tech District, Suzhou City, Jiangsu Province, China

#### **Huali "Wiley" Zhang**

Mr. Zhang is associated with JWJ Technology LLC ("JWJ"), an independent vendor experienced in building digital currency mining facilities such as the facilities at issue in this action. JWJ was retained to assist BCB Cheyenne LLC ("BCB") in completing construction of the North Range facility (which experienced significant cost overruns and construction delays). Also, after BCB

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walked off the job in March 2023, JWJ assumed additional responsibilities at the digital currency mining facilities at issue in this case.

MineOne Data's work with JWJ ended when President Biden signed his May 13, 2024 Order requiring the MineOne Defendants to divest from the North Range property and remove all of the infrastructure and miners thereon.

Mr. Zhang's last known address (taken from an invoice issued by JWJ in connection with the digital currency mining project, a copy of which is attached hereto) is:

JWJ Technology LLC 614 N DuPont Hwy, Suite 210 Dover, Delaware 19901

Sincerely,

Paula K. Colbath

Partner

cc: Sean Larson, Esq.

Marc Gottlieb, Esq. Meggan Hathaway, Esq. Marc Feinstein, Esq. Khale Lenhart, Esq.

**Enclosure** 

#### Message

From: li Iris [zelara@hotmail.com]

on behalf of li Iris < zelara@hotmail.com > [zelara@hotmail.com]

Sent: 1/19/2023 10:26:59 AM

To: Michael Murphy [murf@bcbv.net]

CC: Neil Phippen [neil@bcbv.net]; Emory Patterson [emory@bcbv.net]; Alice Shan [alice.s@mineonepartners.com]; li Iris

[zelara@hotmail.com]; Ziyao Shao [ziyaoshao@gmail.com]; noemikii@outlook.com; rengifo@ucholding.com;

Jiaming Li [jiam@ucholding.com]; Info@MineOne [info@mineonepartners.com]

**Subject**: FW: payments for Friday 01/06/2023

Attachments: lsxwdnKsbmkuaTXyrHtIFRlbXBvcmFyeSB3b3JrZXJzIHBheSBzaGVldCgxKS54; JWJ invoice-20230115-14240.pdf

Hi Michael,

This invoice is for the labor cost of temporary workers which should be deducted from the bill of Cegen. The timesheet attached.

Any questions, please let us know. Thank you.

With Regards

Iris

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### DOCUMENT PRODUCED IN NATIVE FORMAT

CONFIDENTIAL MINEONE0013711

## INVOICE

JWJ Technology LLC

614 N DuPont Hwy, Suite 210 Dover, Delaware 19901

**BILL TO** 

MineOne Wyoming Data Center

INVOICE #
INVOICE DATE

2023010101

2023/01/15

**DUE DATE** 

Due Upon Receipt

QTY	DESCRIPTION	UNIT PRICE	AMOUNT
1	Labor cost 2022.12.15-2023.1.15 time sheet attached		14,240.00
		TOTAL	\$14,240.00



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